

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

CR. NO. 17-20595

v.

HON. VICTORIA A. ROBERTS

YOUSEF RAMADAN,

Defendant.

_____ /

**MOTION FOR MODIFICATION OF BOND CONDITION TO ALLOW
TRAVEL OUTSIDE THE STATE OF MICHIGAN**

Defendant Yousef Ramadan, through his attorneys, Andrew Densemo and Amanda Bashi, of the Federal Community Defender, hereby moves this court to modify his bond conditions to allow him to travel to outside the state of Michigan for employment purposes. In support of same, Mr. Ramadan states as follows:

1. Mr. Ramadan was released on bond on January 15, 2021.
2. Several status conferences, bond review hearings and a lengthy trial have been held since Mr. Ramadan's release.
3. Subsequent to most of these hearings the Court amended and/or terminated certain restrictive conditions of Mr. Ramadan's bond.

4. The Court's decision to do so was guided by Pre-Trial Services' reports of Mr. Ramadan's strict compliance with his bond condition. To date, Mr. Ramadan's bond conditions have been modified to less restrictive conditions several times. Mr. Ramadan has proven that he is committed to complying with all bond conditions set by the court. Mr. Ramadan's bond was continued after his convictions on the underlying charges.

5. Mr. Ramadan requests that the bond condition requiring him not to travel outside the state of Michigan be modified to allow him to travel outside the state for employment purposes. Mr. Ramadan obtained a CDL license over the past six months in an effort to increase his earning potential.

6. Attached is a letter from Mr. Ramadan's employer, (Exhibit 1) which states that Mr. Ramadan has the opportunity to increase his income by performing work for his company, Smith's Towing Service, in Ohio, Illinois, Kentucky and Pennsylvania.

7. Mr. Ramadan's employer, Haitham Shreteh has agreed to work with Pre-Trial Services in confirming work assignments and the location(s) Mr. Ramadan would be asked to travel to.

8. Since his release on bond, including post trial, Mr. Ramadan has complied with every condition set by the court.

9. The defense sought concurrence from the Plaintiff but was unable to gain concurrence in the relief requested.

WHEREFORE, Defendant respectfully requests that this Court enter an Order allowing him to travel outside the state of Michigan for employment purposes.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

ANDREW DENSEMO

AMANDA N. BASHI

Attorneys for Yousef Ramadan

613 Abbott, Suite 500

Detroit, Michigan 48226

Phone: (313) 967-5829

E-mail: andrew_densemo@fd.org

Dated: December 6, 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

CR. NO. 17-20595

v.

HON. VICTORIA A. ROBERTS

YOUSEF RAMADAN,

Defendant.

_____ /

**BRIEF IN SUPPORT OF
MOTION FOR RELEASE ON UNSECURED BOND**

Defendant re-alleges the factual representation made in his Motion for Modification of Bond. This Court has the authority, pursuant to 18 U.S.C. § 3145(a)(2), to amend the previous order of release. Mr. Ramadan has been on Pre-Trial Release since January 15, 2021. Several of his bond conditions have been amended or terminated altogether. He has faithfully complied with every condition the court has imposed. He has proven that he respects this court's orders by virtue of his strict compliance with each of them over the past eleven months. The GPS monitoring condition will remain in place, thereby assuring Pre-Trial Services' ability to constantly monitor his whereabouts. Over the past eleven months, Mr. Ramadan has shown beyond peradventure that he is not a risk of flight. Mr. Ramadan

has taken steps to increase his earnings which will benefit he and his family. We submit that Mr. Ramadan's nearly year long compliance with all of his bond conditions is indicative of trustworthiness and warrants the modification sought herein.

CONCLUSION

Based on the foregoing, Mr. Ramadan respectfully requests that this Honorable Court modify the conditions of his bond and allow him to travel outside the state of Michigan for employment purposes.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

ANDREW DENSEMO

AMANDA N. BASHI

Attorneys for Yousef Ramadan

613 Abbott, Suite 500

Detroit, Michigan 48226

Phone: (313) 967-5829

E-mail: andrew_densemo@fd.org

Dated: December 6, 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

CR. NO. 17-20595

v.

HON. VICTORIA A. ROBERTS

YOUSEF RAMADAN,

Defendant.

_____ /

CERTIFICATE OF SERVICE

I, hereby certify that on December 6, 2021, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Doug Salzenstein and Jonathan Goulding
Assistant United States Attorneys
United States Attorney's Office
211 W. Lafayette, Ste. 2001
Detroit, MI 48226

FEDERAL COMMUNITY DEFENDER

s/Andrew Densemo

ANDREW DENSEMO

AMANDA N. BASHI

Attorneys for Defendant

613 Abbott, Suite 500

Detroit, Michigan 48226

Phone: (313) 967-5829

E-mail: andrew_densemo@fd.org

Dated: December 6, 2021